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U.S. DISTRICT COURT E.D.N.Y.

★ APR 20 2021 ★

JJD:MEF F. #2021R00288

LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

DAVID CORWIN, also known as "Joe Klein,"

Defendant.

\_\_\_\_\_v

INDICTMENT

Cr. No.

21 218

(T. 18, U.S.C., §§ 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), 2253(a), 2253(b) and 3551 et seq.; T. 21, U.S.C., § 853(p))

> SEYBERT, J. LINDSAY, M.J.

THE GRAND JURY CHARGES:

## COUNT ONE

(Receipt of Child Pornography)

1. On or about and between March 1, 2021 and March 24, 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant DAVID CORWIN, also known as "Joe Klein," did knowingly and intentionally receive one or more visual depictions, to wit: the digital videos and images depicted in the computer files with the names (a) Pthc-Lea.wmv, (b) AZWkykyzxzx.avi and (c) 014xAidx4xTLZ.gif, using a means and facility of interstate and foreign commerce, and which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production

of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions having been of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

### <u>COUNT TWO</u> (Possession of Child Pornography)

2. On or about March 18, 2021, within the Eastern District of New York, the defendant DAVID CORWIN, also known as "Joe Klein," did knowingly and intentionally possess matter which contained one or more visual depictions, to wit: digital videos and images stored on an ASUS desktop computer, with serial number EAPDCG0009J3, that had been mailed, and had been shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and which were produced using materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions having been of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

#### CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), which requires the forfeiture of: (a) any visual depiction described in Section 2251, 2251A, 2252, 2252A, 2252B or 2260

of Title 18 of the United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting, or traceable to, gross profits or other proceeds obtained from such offenses; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property, including but not limited to: one (1) ASUS desktop computer, with serial number EAPDCG0009J3, and other electronic devices obtained from the defendant on March 18, 2021 at his residence in Greenport, New York.

- 4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
  - (a) cannot be located upon the exercise of due diligence;
  - (b) has been transferred or sold to, or deposited with, a third party;
  - (c) has been placed beyond the jurisdiction of the court;
  - (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b), to seek forfeiture of any

other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 2253(a) and 2253(b); Title 21, United States Code, Section 853(p))

A TRUE BILL

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FOREPERSON

MARK J. LESKO

ACTING UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK

F.#: 2021R00288 FORM DBD-34 JUN. 85

No.

### UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

**CRIMINAL DIVISION** 

### THE UNITED STATES OF AMERICA

vs.

DAVID CORWIN, also known as "Joe Klein,"

Defendant.

# **INDICTMENT**

(T. 18, U.S.C., §§ 2252(a)(2), 2252(a)(4)(B), 2252(b)(1), 2252(b)(2), 2253(a), 2253(b) and 3551 et seq.; T. 21, U.S.C., § 853(p))

Filed in open court this	day	.,,,
of A.D. 20		
		Clerk